

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>LECLAIRRYAN, A PROFESSIONAL CORPORATION</b> 1037 Raymond Boulevard Sixteenth Floor Newark, NJ 07102 Telephone (973) 491-3600 Facsimile (973) 491-3526 Kim R. Lynch, Esq. (KL-5866) <a href="mailto:kim.lynch@leclairryan.com">kim.lynch@leclairryan.com</a> Attorneys for Charles M. Forman, Chapter 7 Trustee	
In Re:  WRS HOLDINGS, LLC; <u>et al</u> <sup>1</sup> ,  Debtors.	Chapter 7 Case No. 10-28457 (SLM) Jointly Administered  Hearing Date: May 30, 2017 Hearing Time: 10:00 a.m

**NOTICE OF TRUSTEE'S MOTION FOR ENTRY OF AN ORDER  
DISALLOWING THE PROOFS OF CLAIM FILED BY FORD  
MOTOR CREDIT COMPANY LLC IN THE DEBTORS' CASES**

To: Ford Motor Credit Company  
Attention: President/Partner  
or Managing Agent  
P.O. Box 537901  
Livonia, MI 48153-7901

Ford Motor Credit Company  
Attention: President/Partner or  
Managing Agent  
P.O. Box 6275  
Dearborn, MI 48121

John R. Morton, Jr., Esq.  
110 Marter Avenue, Suite 301  
Moorestown, NJ 08057  
Attorney for Ford Motor Credit Company

**PLEASE TAKE NOTICE that your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.**

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<sup>1</sup> The Debtors in these jointly administered chapter 7 cases are WRS Holdings, LLC, Case No. 10-28457 (DHS); WRS, LLC, Case No. 10-28461 (DHS); Woods Restoration Services, LLC, Case No. 10-28465 (DHS); Woods Restoration Services of South Carolina, LLC, Case No. 10-28471; Woods Restoration Services of Montclair, New Jersey, LLC, Case No. 10-28474 (DHS); Environmental Remediation Concepts, LLC, Case No. 10-28476 (DHS); and WRS, Inc., Case No. 10-28478 (DHS).

**If you do not have an attorney, you may wish to consult with one.**

**PLEASE TAKE NOTICE** that on May 30, 2017 at 10:00 a.m. or as soon thereafter as counsel may be heard, Charles M. Forman., the chapter 7 trustee (the "Trustee") of the above captioned debtors, through his attorneys, LeClairRyan, a Professional Corporation, will move before the Honorable Stacey L. Meisel, United States Bankruptcy Judge, United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, Courtroom 3B, 50 Walnut Street, Newark, New Jersey 07102, for the entry of an Order pursuant to 11 U.S.C. §§502(a) and Rule 3007 of the Federal Rules of Bankruptcy Procedure disallowing the proofs of claim filed by Ford Motor Credit Company LLC in the debtors' cases as set forth on Schedule A attached to the Certification of Charles M. Forman submitted herewith, and for such additional relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that the Trustee is submitting a Certification, Memorandum of Law and a proposed order in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-2(a)(2)(i), responsive pleadings, if any, must be filed with the Clerk of the Bankruptcy Court, United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, P.O. Box 1352, Newark, New Jersey 07101-1352, and served on LeClairRyan, a Professional Corporation, Attorneys for the Trustee, Attn: Kim R. Lynch, Esq., One Riverfront Plaza, 1037 Raymond Boulevard, Sixteenth Floor, Newark, New Jersey 07102, at least seven (7) days prior to the hearing date.

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief sought may be granted without a hearing.

**LECLAIRRYAN, A PROFESSIONAL CORPORATION**  
Attorneys for Charles M. Forman.  
Chapter 7 Trustee

By: /s/Kim R. Lynch  
Kim R. Lynch

Dated: April 28, 2017